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FEASIBILITY STUDY
OF A
CENTRAL INDEX
OF INTELLIGENCE INFORMATION
RELEASED TO THE PUBLIC

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I. INTRODUCTION

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In Reference 1 (attached), [REDACTED] requested that a feasibility study be made for a central index for intelligence information released to the public. The index would serve the Information and Privacy Staff (IPS). In particular, the index would:

- Assist the Information and Privacy Staff and directorate FOI offices in identifying and retrieving previously released documents when responding to new FOI requests.
- Enable a damage assessment on the impact of the laws through the use of a cross referenced compilation of information.
- Assist the Office of Legislative Counsel and Assistant to the DCI when responding to requests for Agency information.
- Provide a list of released documents upon request.

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During discussions with [REDACTED] other IPS personnel, representatives from the Office of Security, Information Systems and Analysis Staff, Office of Technical Services, and [REDACTED]

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[REDACTED] from the Central Reference Service (CRS) as to the scope and nature of the index, it became apparent that manpower resources to maintain the index is a crucial IPS consideration. Questions as to what documents the index should contain, who would do the indexing, and associated legal responsibilities were also discussed. There was even a suggestion that the indexing of the data and maintenance of an indexed data base be contracted out. Substantive discussions, however, finally focused on the fact that IPS was really at the

center of activities, the index would be essentially theirs, and the responsibility of a systems manager and input work would fall entirely upon IPS. Consequently, IPS prepared a memorandum (reference 2 - attached) outlining the nature of the records to be included in the Automated Index Data Base as well as those to be excluded.

Presently, IPS has been building an indexed data base using DECAL, which is on the AEGIS System maintained by CRS. DECAL was developed by the CRS Systems Analysis Staff (SAS/CRS) when IPS determined that an index of documents released to the public was needed. However, at the initiation of this feasibility study, IPS and CRS questioned DECAL as a suitable system to meet the needs of an expanded index.

II. PROBLEM DEFINITION

General

Under E.O. 11652, the Privacy Act of 1974, or FOIA, IPS must respond quickly to requests for information. If the information is classified, the responsible Agency component must determine what, if any, information is releasable. IPS forwards the information to the requester or otherwise informs the requester of the Agency's disposition of the request.

Often, IPS gets repeated requests for information which has been previously declassified or sanitized. When this happens, it is important that IPS provide the second requester with at least as much information as they provided the first requester. Therefore, the indexing system must be capable of determining what information has already been provided requesters on subjects, countries, and various other topics or keywords and phrases. Furthermore, the information, of necessity, must be cross referenced to assure that related requests receive consistent responses.

In addition, IPS needs to supply other Agency components with listings of documents which have been sanitized or declassified. Other listings, sorted in various ways, will be needed for Agency components such as the Office of Legislative Counsel to facilitate their handling of possible litigations.

The determination of what documents will be included in the system and how they will be indexed will be made by IPS. Presently, IPS estimates that about 2000 documents/year will qualify for inclusion in the data base. That is about eight documents/day and could

be input easily and maintained by the IPS staff with a single computer terminal. IPS has found that hard copy listings sorted first by country, then by subject, and finally by keyword, which they have obtained using DECAL, will be sufficient to determine who, what, and when for their day-to-day activities. With only about eight records being added each day, new listings about once a month but not more than twice a month should be sufficient to maintain current and timely information. Periodically, requests might require an updated listing or query, but the nature of the hardcopy sorts makes it difficult to see how a record or group or records could not be found quickly. So far, this has been the experience of IPS; only a few on-line queries have been necessary in the past year using DECAL. In summary, no significant requirement for on-line query capability has been demonstrated. However, IPS is uncertain of possible future needs, and believes an on-line query capability would be a desirable option.

IPS does not believe that it will be necessary to keep track of most documents indefinitely, but a precise time for deleting records has not been determined. In any event, a maintenance program capable of automatically deleting document records after a certain date, unless exempted, is highly desirable. This would reduce the future IPS office workload considerably.

Specific Requirements

In terms of information content the following data items will be required for an effective automated index. New data field requirements asterisked are those not presently in DECAL.

- DOCUMENT NUMBER (25 to 34 bytes) - Document number is divided into three sub-fields: organization (3 bytes), office component (7 bytes), and original document number (minimum of 15 bytes with a maximum of 24 bytes desired). Many items such as memoranda, letters, etc. do not have an old document number. It is suggested that IPS develop a systematic and uniform procedure for tagging these items. Memoranda and letters could be tagged as - MEMO/Authors initial/Date, LETR/Authors initials/Date.
- * RELEASED AS (3 bytes) - The "released as" field records whether the document has been sanitized or declassified. Since there may be several sanitized versions of the same document, this field is multi-valued (or periodic).
- * DOCLOC (7 bytes) - DOCLOC is the document location (organization/office).
- * PAGES (3 bytes) - Pages is the physical number of pages sent to a requester. This information is used as a measure of quantity and cost.
- * PUBLICATION DATE (6 bytes) - Publication date is the date the document was published (YRMODA).
- * DOWNGRADE DATE (6 bytes) - Downgrade date is the date the document was downgraded (YRMODA).

- * AUTHORITY
(6 bytes) - Authority is the employee number of the Agency employee who downgraded the document.
- * OLD CLASSIFICATION
(1 byte) - Old classification is self-explanatory. No reference to codeword will be indicated.
- TITLE
(40 bytes/line) - Title is the title of the document and may be a multi-valued (periodic) or variable length field.
- KEYWORDS
(25 bytes) - Keywords is a very important multi-valued (or periodic) field. Keywords, or phrases treated as a word, describe in a very succinct terms the contents of the document, over and above information contained in the title and other fields. For example, BAY_OF_PIGS, CASTRO, and INVASION might be considered keywords in describing a document on the Bay of Pigs invasion. IPS believes a maximum of ten separate keywords are needed to describe each document.
- * REQUESTER
(14 bytes) - The requester field contains the name of the first individual requesting the document.
- * REQUESTER NUMBER
(8 bytes) - Requester number is an IPS log number assigned to a request when received. The request number is the record ID of an automated log now under development for IPS.

SUBJECT CODE
(6 bytes)

- The Subject Code field contains the subject or subjects discussed in the document, i.e. Military Aid, Politics, etc. The subject code field is a multi-valued field (or periodic).

AREA CODE
(3 bytes)

- There are two area code fields associated with each subject. These fields contain

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* INPUT DATE
(5 or 6 bytes)

- A field used for maintaining the data base. This is the date a record is input into the system.

Two conversion tables will be associated with the above data. One table will be needed to convert approximately 300 subject codes into English equivalents. A second table will likewise be needed to convert approximately 200 country codes.

In terms of volume, it is estimated that the data base will stabilize in the neighborhood of 10,000 records. With an average of 475 characters (bytes) per record, the total volume will be about 4.75 million bytes.

In addition, nine separate report programs will be needed to produce listings. Included in these programs will be sorts by country, country/subject, country/subject/keyword, keyword, keyword/country, downgrade date, and requester.

III. PROBLEM/SOLUTIONS

DECAL/AEGIS

As indicated in the introduction, DECAL was developed by CRS for IPS because it offered a quick solution to their problems. However, on examination of the requirements, DECAL continues to satisfy most and exceeds some IPS requirements. In terms of data content, there are three fields of information, the number of pages in a document, input date, and the document location, that have not already been included in the DECAL data base. Additionally, IPS would like to increase the length of the old document number field. This, however, is not a strong requirement by IPS because they have already developed a systematic way of cutting down extremely long document numbers to conform with the 15 characters allowed in DECAL. The problem has been that at the time DECAL was developed, separate fields were not used for publication date, downgrade date, old classification, authority, requester, requester number, and released data field. Since this information is very important for each document, IPS is inputting the data as keywords. Consequently, only four more keywords could be input through the initial input form. Presently, however, even this limitation can be overcome, although not easily, because a virtually unlimited number of keywords can be input into a record on a subsequent Batch maintenance job.

Another current DECAL drawback, however, is the limited number of subject codes which are converted on output into English equivalents. Presently, subject codes are only broken down into

seven major subjects on output, i.e. Politics, Armed Forces, etc. While IPS would like a complete breakdown of these codes into approximately 300 specific subjects, they have indicated that this is not a strong requirement. In fact, IPS has shown flexibility with respect to the detailed subject code requirement and has indicated that they would be satisfied with having the capability of printing and sorting the data under detailed subject code headers rather than the English equivalents if the latter alternative presents any great programming problems. Clearly, however, the latter would be more desirable.

Finally, IPS has had a terminal access problem. Presently, IPS personnel have to go downstairs and use a CRS terminal, if available, and this has created some inconvenience.

DECAL represents many advantages, with the most notable - the system already exists and it works. In addition, DECAL already offers IPS on-line query capability which exceeds their real requirements. In stating the type of output IPS personnel wanted from a new system, no substantial deviations in data content from what they are presently getting were requested. Another important consideration is training. Mr. Emerson of IPS already has a high exposure to DECAL and knows how to make queries using DECAL with minimum SAS/CRS assistance.

One solution then, for an IPS indexing system, is to modify DECAL. This can be handled by using other fields in DECAL/AEGIS to store the six mandatory data elements presently being input as keywords.

IPS would then be able to input up to ten additional keywords per record on the initial input form. In addition, the number of pages, document location, and input date could likewise be added to the DECAL data base.

There are several ways the above modification of DECAL could be made. One possibility would be to include the additional fields into an unused AEGIS periodic set. Some of the data such as pages, document location, and input date might be stored in unused fixed fields. The output tables used to convert subjects could be increased. What is important to note is that DECAL could be satisfactorily modified to handle the data.

In essence, the above considerations would require the following modifications to the DECAL system.

- Alter the on-line form to include the number of pages, document locations, and the mandatory data presently being input as keywords.
- Make available report programs which reflect the new data fields.
- Make available expandable subject codes.

In addition, ODP will need to connect the DECAL System via the COMTEN 2 or 3 to the Delta Data terminal which IPS is scheduled to receive. Further, IPS personnel would have to add data to the present 550 records in DECAL to provide the additional mandatory data which would be required for a modified DECAL system.

In deference to CRS, whose staff is the most knowledgeable of DECAL/AEGIS, precise cost figures for modifying DECAL will not be made; however, a similar situation to modify an application in ODP

on the GIMS system would cost about \$3800. This estimate would include five manweeks for additional analysis and programming. Computer cost would be about \$400. The actual cost for CRS could be more or less depending on the peculiarities of AEGIS.

GIMS

A second option would be to develop an entirely new application using GIMS.

A GIMS system would have the following capabilities:

- ° On-line input and query capability.
- ° Hardcopy of on-line queries would be obtainable on IPS's TI printer or through routing to DAC.
- ° Hard Copy Reports and listings would be made available.

The application would be essentially the same as the modified DECAL system.

Resources required would be as follows:

1 GIMS programmer	23 manweeks
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At \$17/hr, total manpower cost would be:

$$17 \times 40 \times 23 = \$15,640$$

Computer cost is estimated to be \$2000. Total cost for the GIMS System would be \$17,640. The above manpower estimates includes two ODP manweeks for user training. IPS, of course, would have to designate someone on their staff for this training.

Contracts

Consideration was given to the possibility of contracting both the software development and the indexing function. The current requirements, however, do not warrant such a contract. Eight documents per day to index is something less than a full-time job, and a contract to perform the indexing would probably take just as much in-house effort when all factors such as contract monitoring, day-to-day coordination, etc. are considered. A contract to develop the software would seem to be likewise misplaced. IPS already has with DECAL a basic software system which meets major requirements. With modification, DECAL could become an acceptable system. But even if a new GIMS system were built, an external contract would seem inappropriate since the effort is not large and the needed resources can be made available in ODP.

IV. RECOMMENDATION

It is recommended that IPS stay with the DECAL/AEGIS system and submit a request to CRS to implement the necessary changes.

Attachments:

STATINTL Reference 1: Memorandum For: ODP/DDA
From : [REDACTED]
Subject : Request for Feasibility Study

STATINTL Reference 2: Memorandum for Discussion
From : [REDACTED], IPS
Subject: Tentative Proposals as to Records to be
Included in Automated Index to Released
Documents

23 August 1976

STATINTL MEMORANDUM FOR: Director of Data Processing, DDA
Director, Central Reference Service

FROM : [REDACTED]
Assistant for Information, DDA

SUBJECT : Request for Feasibility Study

1. Numerous Agency documents have been declassified and released to the public in response to the Freedom of Information Act or Privacy Act and requests for review under Executive Order 11652. To date, there is no central index to record this material despite the obvious need for maintenance and publication of such an index. As the volume of intelligence information in the public domain continues to increase, the need becomes more critical and we can procrastinate no longer.

2. Confirming discussions held at meetings of the Agency working group convened to address this general problem, I would appreciate ODP and CRS undertaking a joint feasibility study for the establishment of the index of substantive documents officially released through Freedom of Information or Executive Order 11652 channels. Because of the CRS charter for indexing and their experience with a similar file (DECAL) in AEGIS, their participation in the study is desired.

3. This index will serve Agency customers and the public in general. Primarily, it will assist the Information and Privacy Staff and directorate FOI offices in surfacing and retrieving previously released documents in response to new requests. From the organized compilation of public information, the DDO will be able to prepare accurate and meaningful damage assessments of the impact of the laws. The Office of General Counsel will find the indexed information useful in litigation proceedings. The Office of Legislative Counsel and the Assistant to the DCI, [REDACTED] would have access to the index when they respond to requests for Agency information. In addition, the listing of released documents would be available to requesters who wanted to know what we had released.

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4. Over the past several months, the scope of this index has been discussed frequently. We do not want to define the scope so narrowly that future requirements and capabilities are not anticipated. But, as we envision it now, the index should be able to answer the question of what documents or portions thereof have been released on a specific subject and where the copies of those documents are located.

5. The size of the index is a disputed point. We estimate the annual input to be 3,000 to 5,000 documents, but the past two years of released material must be included if the index is to be a useful research aid to what information is in the public domain. One estimate of this volume is 15,000 to 20,000 documents.

6. January 1, 1977, is our target date for an operational index. We hope to be able to put into the system all substantive intelligence documents released after that date. The backlog of 1975 and 1976 released material will be done as time and resources permit.

7. Attached hereto is a copy of the minutes of the 12 August meeting of the Index Working Group which detail the key elements of information the Group feels should be included in the index.

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17 August 1976

MEMORANDUM FOR THE RECORD STATINTL

FROM : [REDACTED]
Office of the Assistant for Information, DDA

SUBJECT: Meeting of the Index Working Group, 12 August

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1. [REDACTED] of CRS and [REDACTED] of ODP attended this meeting in the DDA conference room to provide technical guidance on our Index requirements. As a result of their participation, we agreed that the feasibility study should be a joint effort between ODP and CRS.

2. A list of data elements was distributed and reviewed. The following items were agreed upon:

- a. Requester (and his organization, if known; litigants, in the case of court action).
- b. Source document originator/holding component.
- c. Document number.
- d. Document title (expanded, if necessary, to be meaningful; should include the subject of original request; should keyword geographic area and specific subjects covered in the document).
- e. Original classification.
- f. How was document released:
 - (1) Sanitized (authority and date) or
 - (2) declassified (authority and date).
- h. Code and numbering sequence to differentiate FOIA, E.O. 11652 and PA responses.

- i. Date of record input (to be done automatically by the computer).

3. Also discussed was the disposition of copies of sanitized documents. Several of the people felt that the components should not maintain the sanitized copies of their own documents, but that IPS should be the office of record for all document sanitizations.

4. The proposed Index must have an update capability in order to be a dynamic research aid. If a sanitized document is requested a second time and more information is released, the Index must be annotated accordingly. The latest sanitization is the most important since we would never release less a second time than we did the first.

5. This was the last formal meeting of the working group. Shortly, [REDACTED] will send ODP and CRS the request for a joint feasibility study. Once that is done, additional group meetings may be required to coordinate the details of the Index.

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Distribution:

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/IPS/DDA
ISAS/DDA
/DDO
S/DDI
/DDI

MEMORANDUM FOR DISCUSSION

STATINTL FROM : [REDACTED]
Information and Privacy Staff

SUBJECT: Tentative Proposals as to Records To Be Included in
Automated Index to Released Documents

1. Purpose of Index

There is general agreement on the need for the Agency to develop a system for recording the declassification and/or release, in whole or in part, of records of CIA origin. At the minimum, the system should give users the capability to:

- a. List in orderly sequence declassified CIA records to facilitate compliance with the "holder notification" requirements of the National Security Council Directive (II.E.) implementing Executive Order 11652.
- b. Do lookups, either from a terminal or by means of machine listings, to determine whether specific documents have been previously released.
- c. Search for previously released records pertaining to a historical event, a foreign area, an organization, an individual, a project, or any other topic which might be the subject of a future request.
- d. Determine where copies of previously released records may be obtained.
- e. Compile listings of released records for the perusal of members of the public, which, according to some authorities, is a requirement of 5 U.S.C. 552(a)(2).

2. Assumptions

In various meetings where the need for an index was discussed, spokesmen for other Agency components stressed their desire that the data base be all-inclusive, covering "information" (e.g., disclosures found in the reports of the various groups which investigated the CIA) as well as documents released to members of the public by the Agency in administering the Freedom of Information Act, the Privacy Act, and Executive Order 11652. No component, however, has volunteered to maintain the index or to contribute substantial resources toward its maintenance. We are proceeding, therefore, under the following assumptions and constraints:

- a. Maintenance of the data base (i.e., selection of records, indexing, data input and verification, etc.) will be the responsibility of the Information and Privacy Staff, with systems support provided by the Office of Data Processing. The Central Reference Service will be asked to assist in devising a standardized scheme for recording bibliographic citations, which is complicated by the diverse nature of the items to be indexed.
- b. No additional manpower will be added to the Information and Privacy Staff, thereby limiting the coverage of the index to what can be accomplished with the manpower currently available. (Indeed, the on-board strength of the Staff may be reduced during the coming months.)
- c. With rare exceptions, the file coverage will be confined to records released pursuant to Executive Order 11652, the Freedom of Information Act, and, very selectively, the Privacy Act. Any program to develop a capability for retrieving data concerning other categories of information releases (e.g., information disclosed in the Church and Rockefeller Committee reports, documents or information included in the Pentagon Papers, records released in the course of litigation, press releases, etc.) will result in a separate, but hopefully compatible, system(s).
- d. The system design should be such as to permit future expansion with respect to scope of coverage and data elements indexed.

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- e. Inputting of records into the existing DECAL system should be continued in the interim, with the expectation that this file will be converted to the new record format as soon as a new index system is operational.
- f. It would be desirable to retroactively index, on a time-available basis, all significant CIA records released since 19 February 1975, the date that the amended Freedom of Information Act took effect.
- g. The information retrieval capabilities represented by the IPS subject case files and the automated log now under development should be taken into account in the design and scope of the proposed index to released records.

3. Subject Matter Coverage

Whenever a request is received which duplicates, or is very similar to, one previously processed, we must be able to identify the earlier request(s) and locate all relevant files. By so doing, we would be able to avoid redundant searches and reviews, and also ensure that we did not deny information to one requester which had already been released to another. At the risk of oversimplification, it can be said that any of the broad areas listed below could be the subject of repeated requests, and therefore responsive records released should be indexed or retrievable through some other system:

- a. Reporting and analysis on any foreign intelligence topic.
- b. Information maintained by the Agency on U.S. domestic organizations and institutions.
- c. Information pertaining to the Agency mission, functions, organization, history, etc.
- d. Information on programs (such as drug experimentation) widely regarded as extralegal or falling outside the Agency charter.
- e. Information concerning Agency covert action programs.
- f. Information on public figures (U.S. or foreign; living or dead).
- g. Information on topics of proven interest (such as UFOs or the JFK assassination).

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4. Records to be Excluded from Index

Unindexed material will nonetheless be subject to a measure of control. With regard to those records released to the public in connection with FOIA, PA, and EO requests, the IPS case files contain lists of records denied or released in their entirety, plus actual copies of all records released in sanitized form. Moreover, documentation in these files identifies the components holding the records not physically included in the folders. Retrieval, however, is now limited to retrieval by name of requester or case number (supplemented, of course, by the recollections of individuals who worked on the requests). Indexed material, on the other hand, will be retrievable by any combination of attributes (document number, document title, keywords, area code, publication date, original requester, originator, sanitized or declassified, ad inf.).

The Information and Privacy Staff currently maintains a manual log for all FOIA, PA, and EO requests. The Office of Data Processing has under development an automated logging system to replace the manual log. One of the capabilities of the automated log will be that it will be possible to search the "subject" field, probably through keywords. If this system is implemented, the automated log would thus enable us to identify previous requests for records on named projects, organizations, individuals, etc.--assuming that the search topics had been keyworded--and examine the relevant case files to determine what has been released.

It is proposed that the following categories of records--some of which are seldom involved in request responses anyway--not be indexed:

- a. Open source materials.
- b. Unclassified records, unless released in segregated form.
- c. Records originated by other agencies, even though they may contain information derived from CIA reports or concern CIA activities or personnel.
- d. Unclassified maps, reference aids, intelligence studies, translations of foreign broadcasts and press items, etc., released to the public through the facilities DOCEX/LC, NTIS/Commerce, or the GPO.

- e. Speeches, Congressional testimony, press releases, and similar materials not involved in requests from the public.
 - f. Records declassified as a result of the 30-year declassification review program.
 - g. Records which, if released to anyone other than the original requester, would constitute an invasion of personal privacy.
5. Records to be Included in Index

Subject to the exclusions listed above, all records released pursuant to FOIA, EO, and PA requests from the public will be considered for indexing. It is anticipated that all CIA records released in connection with EO (mandatory classification review) requests will be indexed; that a large percentage, but not all, of the CIA records released in connection with FOIA requests will be indexed; and that very few of the CIA records released in connection with PA requests will be indexed. It will be the responsibility of the IPS case officer to review all releases, identify the records which meet the criteria for inclusion in the file, and set aside copies for indexing.

It is expected that the types of CIA records listed below will be among the items indexed:

- STATINTL
- a. Intelligence information reports and cables [REDACTED] STATINTL
 - b. Finished intelligence (intelligence memoranda and reports, situation reports, current intelligence daily and weekly periodical issuances, [REDACTED] STIRs, NISS, NIEs, SNIEs, etc.). The system should be designed to accommodate draft versions, as well as the final disseminated versions of certain of these series, and, of course, the nomenclature has undergone change. STATINTL
 - c. Typescript monographs--usually in the form of memoranda--which received limited dissemination.
 - d. Reference aids.
 - e. Staff studies and related policy, management, investigative, or operational papers.

- f. Correspondence. (Transmittal letters and memoranda containing no substantive information would not be indexed, however, unless released in sanitized form.)
- g. Staff cables.
- h. Agency administrative issuances such as notices, regulations, directives, handbooks, etc.
- i. Maps.
- j. Photographs and motion picture films.
- k. Agency histories.
- l. Certain computer listings.
- m. Forms.
- 6. Other Options Under Consideration

It has been suggested that it might be desirable to design the index system so as to accommodate references to "files" as well as individual documents. This option would be followed in instances where a large number of records has been released, many of which would not meet our standards for inclusion in the index (e.g., newsclippings or [REDACTED] items). Examples would be the "Rosenberg documents" and the "Kennedy assassination" documents. A variation of this approach would be to index selectively individual documents judged to be of general interest, in addition to indexing the "file" as a separate entry. If the Staff's plans for an automated log materialize, however, the file entry approach should be unnecessary since the log would afford us the same retrieval capability. STATSPEC

Another suggestion is that we explore the possibility of contracting out the tasks of document indexing and data input preparation. There would seem to be no security problems, and this option would greatly ameliorate the manpower problem.

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IPS/[REDACTED]/cb/16 September 1976

Distribution:

Orig. - Addressee

1 - IPS Chrono

1 ✓ IPS Subject File

ADMINISTRATIVE-INTERNAL USE ONLY

ODP # 2437-76

24 November 1976

MEMORANDUM FOR: [REDACTED]

ODP

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FROM :

[REDACTED]
Information and Privacy Coordinator

SUBJECT : Privacy Act Request

1. This is in reply to your request for a copy of your fitness report, 1 January-31 December 1975.

2. Attached is a copy of segregable portions of the requested report. Deletions have been made under the exemption provisions of the Privacy Act of 1974. The specific subsection pertinent to the deletions made is (j)(1).

3. By way of explanation, subsection (j)(1) of the Privacy Act permits the Director of Central Intelligence to exempt those portions of documents which consist of, pertain to, or would otherwise reveal the names of Agency employees, as defined in Section 6 of the CIA Act of 1949, as amended.

4. As specified in the Privacy Act, I am advising you of your right to appeal these determinations to the appropriate senior official, by writing to the undersigned.

5. We trust that the attached document will meet the requirements of your request.

[REDACTED]
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Attachment

IPS/DM/ps: 24 Nov 76

Distribution:

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1 - IPS Chrono

1 - IPS (P-76-2111)

1 - OP

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